

**RSG Subgroup Meetings
Hamburg, Germany**

21-22 February 2018

This was a meeting of the Recreational Craft Sectoral (RSG) Subgroups. The subgroups consist of the Notified Bodies (NB) for the Recreational Craft Directive, and representatives of industry. NMMA is a member of these subgroups. The objective of these meetings was to deal with issues concerning the applicability of the New Recreational Craft Directive.

PFE – Proposal for Inquiry

RFU – Recommendation for Use

ERFU – Endorsed Recommendation for Use

ARFU – Approved RFU by the Standing Committee

IDG – Internet Discussion Document

NB – Notified Body

CEN – European Committee for Standardization

WG – ISO Work Group

PCA – Post Construction Assessment

AdCo – Administrative Cooperative Working Group

In attendance were representatives from Belgium, Sweden, Italy, Czechoslovakia, Netherlands, Finland, Germany, Norway, United Kingdom, Greece (China), Estonia, CEN, EU Commission, AdCo, ICOMIA, and NMMA.

RSG Conformity Assessment Procedures (CAP) Subgroup Meeting

Administrative Secretariat Report

- There are 30 notified bodies registered. Spain and one of the UK NB are not represented.

Commission Items

- Commission is reviewing the process for bringing ISO standards online, including the transition period. We hope it eliminates the current process of new standards being published with no transition period, such as what happened with ISO 9094.
- Took objection with the RFU using “shall” denoting a requirement. RFU is a recommendation. This can be a large problem for the RSG may need RFU rewrites.

RFU's

- RFU 25, Fire tests for non-metallic fuel filters - Removed, now covered in ISO standard 10088.
- RFU 30, Fuel supply systems on engines - References changed to the Directive and ISO 16147 and 15584.
- RFU 80, Does GAS comply with ISO? - Withdrawn, ISO 10088 removed GAS from the standard.
- RFU 93, Small gas cookers with canisters - RCD is applicable, ISO 10239 does not cover these appliances.
- RFU 114, Craft over 8m still uses ISO 6185-4, Max maneuvering speed, until ISO 11592-2 is published.
- RFU 115, Scope of 25197 covering steering wheels, mechanisms and cables - No action by commission – oops.
- ERFU 117, Steering wheel families - changed referenced standards.
- RFU 118, Weight of liferafts - Shall be part of the total load in A & B craft, and in C & D craft over 6m. Maximum weight of the liferaft is recommended by the manufacturer in owner's manual and in the stability calculations. Send to ISO 12217 for resolution.
- RFU 122, Engine compartment insulation material certified? - No.
- RFU 130, Means to prevent cooking utensils from sliding off - ISO 14895 and 10239 do not cover electric stoves. Do electric cookers/stoves also need a means to prevent cooking utensils from sliding off? Yes. Send to ISO 9094 to update.

- RFU 135, Ventilation opening - Can it be closable? Yes. Send to ISO 10088 for revision.
- RFU 141, Design category of RIBs - Defines a recommended solution for determining design category through ISO standards, though not a requirement to use ISO standards to do this.
- RFU 143, Display of maximum load - It cannot be less than 75kg per person.
- ERFU 144, CE mark for fuel fill? No.
- ERFU 148, CE mark for non-sparking electrical fuel senders in petrol tank or space? Yes.
- RFU 303, Component standards on DoC? No, except for the standards that a craft manufacturer complies with.
- RFU 307, Defines “enter the craft” and “enter the interior of the craft” - Use RFU definition until TC 188 defines these terms.

PFE's

- PFE 304, Are electric canoes and kayaks subject to the RCD? Yes, if over 2.5m length. Need clarification for motorized surfboards.
- PFE 315, Are electric propulsion engines covered in the RCD? These engines are covered by design and construction, and noise emissions. Also, by installation requirements. Other directives may be applicable.
- PFE 320, Fire protection device located in all habitable spaces? No. Follow the detector manufacturer's instructions in terms of number and location. ISO 9094 should be updated.
- PFE 321, Fire detectors in an engine room? Not required in ISO 9094 or the essential requirements.

Issues of the CAP Subgroup

- Database information – Concerned with increasing the work of NB by requiring all certificates be added to an international database. Is it needed? From the RCD, NBs are required to give such a report to their notifying authority. Most NBs are not doing this. Do the Notifying Authorities want to do this? TBD.
- Assessment of products being on EU market without CE marking – Non harmonized approach among members states and seems that will remain at their direction. (Code: Member states are not checking for CE marks). For instance, PCA is not accepted in Finland. That is the current state in the EU.
- Post Construction Assessment – Craft can be assessed with a different engine installed except for emissions. PCA can be done on any component, and on a hull without an engine.
- Assigning MICs for builders in third countries – Need to apply to EU members states for a MIC. See ICOMIA for more information. Notified Body to assure a MIC is applied for.
- RCD Application Guidelines – In final stages at the EU Commission. (This is the old CC paper). Expect to be available in June 2018. Still need to determine if a PCA is necessary after a boat overhaul.
- Accident Investigation Report – RSG will distribute any accident reports available to the individual members.
- Market issues – 1) Sill heights continue to be a problem in assessments. 2) ISO 11817 is under DIS review and needs to be examined closely. RSG members will be submitting negative votes.
- RSG website – Secretariat revised the website to make it user friendly and contain more relevant information. Very well done. Contains more news and more documents. Also summarizes all PFE comments. Can search with key words.
- Access to ISO standards – RSG requested access to parts of ISO standards (copyrighted) that are under general RSG discussions, such as in PFEs, RFUs and RCD compliance. **Action:** TC 188 chair.
- RCD Article 38, Point 4 – After issuing a certificate, a Notified Body must monitor the product for continued compliance. How to do this? IMCI has an embedded process, many NBs do not. Not a subject for a RFU. Is there an RSG general process that AdCo would agree to? **Action:** IMCI to send a paper for AdCo review. **Action:** Commission will check with other NBs in other directives.
- UK has recently decided that ISO 8666 goes against the scope of the RCD in the areas of detachable parts. Under review in the UK. (**Action:** DM)

RSG Technical Issues (TI) Subgroup Meeting

RFUs

- ERFU 22, Ear clamps – do not meet the intent of RCD.
- ERFU 23, Petrol tanks in engine compartments – allowed.
- ERFU 50, Inboard and sterndrive engines – should be ignition protected.
- ERFU 55, Electrical devices in petrol engine/tank compartments – should be ignition protected. ISO 11105 should be revised (published in 2017, but still in revision).
- ERFU 70, Viable means of escape – for multihulls and craft with habitable spaces. Defined by RSG.
- ERFU 77, Integral steering systems – (with the engine): not CE marked. Remote steering systems: CE marked.
- ERFU 92, Fuel tank family – acceptable; family parameters are identified.
- ERFU 102, Sight gauges – withdrawn, part of ISO 21487.
- ERFU 138, Stability curves and equivalents – Yes for PCA Cat A, maybe for PCA Cat B.
- ERFU 139, Fixed openings for LPG systems – Cannot be a closable device such as a portlight.
- DRFU 300, Fire alarms, detectors and volume – alarms are a means of alert and should be of sufficient volume to alert in habitable spaces. Combine with RFU 320. **Action:** Recommended that this DRFU be held until reviewed by the ISO 9094 convener.
- DRFU 306, CO detectors – Not required by either the RCD or ISO 9094.
- DRFU 309, RIB decks – Decks should be treated as recesses.
- DRFU 317, Testing of high speed RIBS – Still use ISO 11592-1 for maneuverability testing.
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PFEs

- PFE 314, Major craft conversion (MCC) – Commission: determination of a major craft conversion is responsibility of the manufacturer. PCA may be needed in a major craft conversion. Too many variations of modifications to warrant a checkbox; should be case-by-case. Commission recommends examples of MCC versus a checklist. Recommended that the trigger limits be scraped and a PFE be written that identifies a risk assignment be done per each essential requirement before a MCC determination can be made. The RSG determined that this will no longer be a PFE but will be a chapter in the RSG guidelines, based on changes to the essential requirements and a risk analysis that will then be evaluated as to whether this will drive an MCC assessment. The list of MMC triggers has been deleted.
- PFE 319, Fire dampers and fixed fire extinguishers – NB to check suitability of systems for type and size of engine space. Check if dampers are required. Review PFE solution with fire extinguishing systems manufacturers. **Action:** Notify manufacturers of this requirement.

The next meeting of the RSG is tentatively scheduled for 17-18 April 2018 in Leuven/Brussels, Belgium. The Fall meeting may be in Stockholm and tentatively set for 10-11 October 2018

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